

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2003-326-C

In Re:

Analysis of Continued Availability of Unbundled)
Local Switching for Mass Market Customers)
Pursuant to the Federal Communication)
Commission's Triennial Review Order)
_____)

**COMPSOUTH'S RESPONSES TO BELL SOUTH'S FIRST REQUEST FOR
ADMISSIONS; FIRST SET OF INTERROGATORIES AND FIRST REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Competitive Carriers of the South ("CompSouth"), pursuant to S.C. Code Ann. Regs. 103-851 and Order No. 2003-667 issued in this docket on November 7, 2003, hereby responds to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Requests for Admissions; First Set of Interrogatories and First Request for Production of Documents to CompSouth, served on March 16, 2004. Any responses made to BellSouth's interrogatories and requests for production of documents are made subject to the general and specific objections stated herein, the Protective Agreement previously executed between the parties, and any protective order as may be issued by the South Carolina Public Service Commission ("Commission") in this docket.

General Objections

CompSouth makes the following General Objections to BellSouth's First Requests for Admissions, First Set of Interrogatories and First Request for Production of Documents, including the applicable definitions and general instructions therein ("BellSouth's discovery").

1. CompSouth objects to BellSouth's discovery to the extent it seeks to impose an

obligation on CompSouth to respond on behalf of persons that are not parties to this case on the grounds that such interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. CompSouth objects to BellSouth's discovery to the extent it is intended to apply to matters other than those subject to the jurisdiction of the Commission. CompSouth objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. CompSouth objects to each and every interrogatory, document request, and instruction to the extent that such interrogatory, document request, or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. CompSouth objects to BellSouth's discovery insofar as the interrogatories or document requests are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories. Any answers provided by CompSouth in response to BellSouth's discovery will be provided subject to, and without waiver, of the foregoing objection.

5. CompSouth objects to each and every interrogatory and document request insofar as it is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

6. CompSouth objects to providing information to the extent that such information is already in the public record before the Commission or in BellSouth's possession.

7. CompSouth objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on CompSouth that exceed the requirements of South Carolina law.

8. CompSouth objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. CompSouth objects to each and every interrogatory and document request to the extent that it would require disclosure of information that constitutes "trade secrets" and/or proprietary confidential business information.

10. CompSouth objects to any discovery request that seeks to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by CompSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

11. CompSouth objects to any discovery request that is not limited in time or is not limited to a period of time that is relevant to the issues before the Commission and/or reasonably related to BellSouth's legitimate discovery needs.

12. CompSouth objects to any discovery request that would require CompSouth to seek information not in its possession or control or create documents for the purpose of responding to the discovery requests.

13. CompSouth's members are various-sized corporations with employees located in many different locations in South Carolina and other states. In the course of their businesses, CompSouth's members create countless documents that are not subject to state commission or FCC retention of records requirements. These documents are kept in numerous locations that can move from site to site when employees changes jobs or businesses are reorganized. Therefore, it is possible that not every document can be identified in response to these discovery requests. CompSouth will conduct a reasonable search among its members in an effort to

reasonably obtained information to be provided. To the extent BellSouth's discovery would require more, CompSouth objects on the ground that compliance would impose an undue burden or expense.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Referring to pages 16 and 17 of the Direct Testimony of Joseph Gillan, is it your contention that CLECs have tried and failed to serve mass market customers in South Carolina using their own facilities, including, but not limited to, switching? If the answer to this Interrogatory is in the affirmative, please:

- (a) identify all such CLECs;
- (b) describe in detail all attempts that each such CLEC made to serve mass market customers in South Carolina using its own facilities; and

RESPONSE:

Mr. Gillan has not conducted a survey to determine which CLECs tried to serve the mass market in South Carolina using their own switching.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 2:

Referring to pages 21 and 22 of the Direct Testimony of Joseph Gillan, has any analysis, study, or evaluation of a specific cross over or geographic area that the South Carolina Commission might use in evaluating impairment in this proceeding been conducted by, on behalf, or at the direction of CompSouth or Mr. Gillan? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation.

RESPONSE:

In addition to its general objections, CompSouth objects because this interrogatory is overbroad and exceeds the scope of permissible discovery of trial preparation materials and expert witnesses. Notwithstanding its objections, and without waiving them, CompSouth states that neither Mr. Gillan nor CompSouth have completed an analysis that would produce a specific cross over or geographic area recommendation other than that presented in the rebuttal testimony of Joseph Gillan (including the reference to the testimony of Mr. Arbgenbright).

Objections provided by counsel. Answer provided by Joseph Gillan.

INTERROGATORY NO. 3:

Do the carriers that comprise CompSouth utilize the formula referenced on page 26 of the Direct Testimony of Joseph Gillan in determining whether to provide voice serve [sic] to a particular customer using a DS1 rather than multiple UNE analog loops? If the answer to this Interrogatory is in the affirmative, please identify all such carriers and identify all documents referring or relating to their use of this formula.

RESPONSE:

In addition to its general objections, CompSouth objects on the grounds that it is a coalition formed for advocating regulatory policy and has no legal authority to compel its members to respond to indirect discovery of this kind from BellSouth or any other party, and BellSouth was within its rights to serve this Interrogatory individually on CompSouth members if it so chose.

INTERROGATORY NO. 4:

Referring to pages 25 and 26 of the Direct Testimony of Joseph Gillan, identify all documents used or considered by Mr. Gillan in determining that the indicated formula for cross

over “should be used” by the South Carolina Commission in determining the DS-1 crossover.

RESPONSE:

The basis for Mr. Gillan’s discussion that the formula complies with the TRO’s direction that the cross-over be established at “the point where it makes economic sense for a multi-line customer to be served via a DS1 loop” (TRO ¶ 497) is explained in his testimony. See also the testimony of Mr. Argenbright.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 5:

Referring to pages 25 and 26 of the Direct Testimony of Joseph Gillan, since January 1, 2003, state the total number of South Carolina end user customers served by carriers that comprise CompSouth who have indicated that:

- (a) they do not desire DS1-based service because the customer did not want to make space available for channel bank equipment;
- (b) they do not desire DS1-based service because the customer did not want to provide access to its premises to its service provider to maintain or repair the equipment; and
- (c) they desire being served by multiple analog lines rather than a single DS-1 because it makes them “less vulnerable to network failure.”

RESPONSE:

In addition to its general objections, CompSouth objects to this interrogatory to the extent it seeks to impose obligations on CompSouth and its members that exceed those permitted by applicable rules of discovery. Further, to the extent the interrogatory could be interpreted to apply to enterprise customers, CompSouth objects on the grounds the interrogatory is irrelevant

and not reasonably calculated to lead to the discovery of admissible evidence. CompSouth further objects on the grounds that it is a coalition formed for advocating regulatory policy and has no legal authority to compel its members to respond to indirect discovery of this kind from BellSouth or any other party, and BellSouth was within its rights to serve this Interrogatory individually on CompSouth members if it so chose.

Notwithstanding these objections, and without waiving them, CompSouth states on information and belief, that at least eight of its member companies have indicated that they do not track such information in the ordinary course of business and do not possess information responsive to this Interrogatory. CompSouth further states that it is unaware of any of its members who track this information in the ordinary course of business or possess information responsive to this Interrogatory.

INTERROGATORY NO. 6:

Referring to page 32 of the Direct Testimony of Joseph Gillan, identify all documents, including, but not limited to, economic treatises, articles, or literature that support Mr. Gillan's view that geographic markets are properly defined by "the unique competitive signature" of the product.

RESPONSE:

The term "unique competitive signature" is used to describe the competitive ubiquity made possible by access to unbundled local switching. As noted in the testimony, among other factors, the TRO (§ 495) requires state commissions to consider "the locations of customers actually being served (if any) by competitors, as well as "the variation in factors affecting competitors' ability to serve each group of customers" and the "competitors' ability to target and serve specific markets economically and efficiently. . . ." The determination of "impairment

evaluation zones” (labeled “markets” by the FCC) is a task unique to the TRO. There are no other treatises, articles or literature addressing this issue relied upon by Mr. Gillan.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 7:

For those individual carriers that comprise CompSouth, identify each such carrier that decides to enter a market at the wire-center level.

RESPONSE:

In addition to its general objections, CompSouth objects on the grounds that it is a coalition formed for advocating regulatory policy and has no legal authority to compel its members to respond to indirect discovery of this kind from BellSouth or any other party, and BellSouth was within its rights to serve this Interrogatory individually on CompSouth members if it so chose.

INTERROGATORY NO. 8:

For those carriers identified in response to Interrogatory No. 7 that decide to enter a market at the wire-center level, please:

- (a) identify those wire centers in BellSouth’s service territory in South Carolina that each such carrier has decided not to enter;
- (b) explain in detail why the carrier decided not to enter that wire center; and
- (c) identify all documents referring or relating to the process by which each such carrier decides to enter a market at the wire-center level.

RESPONSE:

See objections and response to No. 7.

INTERROGATORY NO. 9:

For those individual carriers that comprise CompSouth, identify each such carrier that decides to enter a market at the LATA level.

RESPONSE:

See objections and response to No. 7.

INTERROGATORY NO. 10:

For those carriers identified in response to Interrogatory No. 9 that decide to enter a market at the LATA level, please:

- (a) identify any LATAs in BellSouth's service territory in South Carolina that each such carrier has decided not to enter;
- (b) explain in detail why the carrier decided not to enter that LATA;
- (c) identify those LATAs in BellSouth's service territory in South Carolina that each such carrier has decided to enter;
- (d) identify any wire centers in those LATAs that each such carrier has entered where the carrier does not provide qualifying service; and
- (e) identify all documents referring or relating to the process by which each such carrier decides to enter a market at the LATA level.

RESPONSE:

See objections and response to No. 7.

INTERROGATORY NO. 11:

Referring to page 33 of the Direct Testimony of Joseph Gillan, has any analysis, study, or evaluation of "a CLEC's costs to extend an analog loop from the wire center where it is currently located to the CLEC's switch location" been conducted by, on behalf, or at the direction of

CompSouth or Mr. Gillan? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation.

RESPONSE:

Mr. Gillan has not performed that calculation for this proceeding. Mr. Gillan is aware of a variety of such analyses that were filed at the FCC in the TRO proceeding and BellSouth has the same access to that record as Mr. Gillan.

Response provided by Joseph Gillan.

INTERROGATORY NO. 12:

Referring to the six trigger criteria identified on page 38 of the Direct Testimony of Joseph Gillan, provide specific references to any and all language in the TRO that support your position that a carrier must meet each of these six criteria in order to qualify as one of the three self-provisioning providers necessary to satisfy the FCC's self-provisioning trigger.

RESPONSE:

In addition to its general objections, CompSouth objects on the grounds that the TRO is a legal order of the FCC and speaks for itself. BellSouth is perfectly capable of interpreting the TRO without assistance from CompSouth. CompSouth is not required to provide legal arguments to BellSouth in discovery and will reserve such arguments for the hearing and its post-hearing submissions.

INTERROGATORY NO. 13:

Admit that for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger the TRO requires, in part, that the carrier be serving mass market customers in the particular geographic market in question using its own local circuit switches.

RESPONSE:

One predicate to satisfying the self-provisioning switch trigger is that the provider be serving mass market customers using its own switch.

Response provided by Joseph Gillan.

INTERROGATORY NO. 14:

If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

RESPONSE:

Not applicable.

INTERROGATORY NO. 15:

Admit that for the purposes of the FCC's switching impairment analysis, the TRO defines mass market customers as analog voice customers that purchase only a limited number of POTS lines and can only be served via DS0 loops.

RESPONSE:

These characteristics are part of the FCC's description of the mass market.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 16:

If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

RESPONSE:

Not applicable.

INTERROGATORY NO. 17:

Admit that the TRO does not expressly require that, when determining whether a competing carrier is serving mass market customers, the group of mass market customers has to include only residential customers or a combination of residential and business customers, as opposed to business customers alone.

RESPONSE:

Although the TRO does not include a specific reference, the TRO does include relevant references that the “state commission should consider whether the entire market could be served by this switch” (in discussing whether potential deployment is possible ¶501), as well as the general direction that states should consider Section V of the TRO (Principles of Unbundling). Among other factors, the FCC determined that “[i]n deciding what weight to give this evidence, we will consider how extensively carriers have been able to deploy such alternatives, to serve what extent of the market, and how mature and stable that market is.” (¶ 94, emphasis added). It is Mr. Gillan’s opinion that excluding a CLEC that does not serve the core of the mass market (i.e., residential customers) from a trigger analysis is consistent with the analytical framework of the TRO.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 18:

If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

RESPONSE:

See response to No. 17.

INTERROGATORY NO. 19:

Does CompSouth contend that in order for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger test the carrier must be serving residential customers? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support this contention.

RESPONSE:

Yes. See Response to No. 17.

INTERROGATORY NO. 20:

Referring to pages 41 and 42 of the Direct Testimony of Joseph Gillan, has any analysis, study, or evaluation of whether CLECs are using their own mass market switches to provide local exchange service to mass market customers in South Carolina been conducted by, on behalf, or at the direction of CompSouth or Mr. Gillan? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation.

RESPONSE:

No.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 21:

Referring to page 43 of the Direct Testimony of Joseph Gillan, identify all CLECs that have "abandoned the mass market segment" in South Carolina because they allegedly "found the operational and economic impairments too formidable to overcome." In answering this Interrogatory, for each such CLEC:

- (a) describe with particularity all efforts made by that CLEC to serve the mass

market segment, including, but not limited to, identifying the geographic market(s) that the CLEC attempted to serve and the types of service offered to mass market customers in each such market;

- (b) describe with particularity the “operational and economic impairments” that the CLEC found “too formidable to overcome”; and
- (c) identify all documents referring or relating to the CLEC’s decision to “abandon[] the mass market segment.”

RESPONSE:

Mr. Gillan has not conducted a survey of individual carriers that offered mass market services in South Carolina using their own switches, but have since abandoned the effort. Mr. Gillan is generally familiar with the consequence of various entry strategies nationally, including ex parte filings made by carriers at the FCC (see, e.g., TRO ¶ 466), citing the “ample evidence” of the problems: “Competitive LECs, like ATX, provide ample testimony in the record reporting on their efforts to serve mass market locations using the hot cut process, claiming that they were forced to cease marketing and discontinue plans to provide switch-based services to mass market customers because they experienced difficulties with service implementation associated with the hot cut process to connect voice-grade loops to their switches.”

Answer provided by Joseph Gillan.

INTERROGATORY NO. 22:

Referring to pages 43-45 of the Direct Testimony of Joseph Gillan, has any analysis, study, or evaluation of whether CLECs are using “ILEC unbundled analog loops to actively compete for POTS service to mass market customers” in South Carolina been conducted by, on behalf, or at the direction of CompSouth or Mr. Gillan? If the answer to this Interrogatory is in

the affirmative, describe with particularity the results of that analysis, study, or evaluation.

RESPONSE:

No.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 23:

Referring to pages 50 and 51 of the Direct Testimony of Joseph Gillan, does Mr. Gillan or CompSouth contend that there are intermodal voice service alternatives in South Carolina other than CMRS providers? If so, identify each such intermodal voice service alternative.

RESPONSE:

No.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 24:

Admit that packet switches and other intermodal switches, used by competitors to provide voice service that is comparable to the service offered by ILECs, count towards the competitive triggers for switching.

RESPONSE:

Packet switches may be counted, but only if the carrier using the switch meets all requisite criteria including cost, quality, and maturity to incumbent LEC services, the requirements of Section V of the TRO (footnote 1549), and otherwise satisfy the criteria as outlined in Mr. Gillan's testimony (i.e., the switch is not properly characterized as an enterprise switch, the provider is relying on ILEC loops, etc.)

Answer provided by Joseph Gillan.

INTERROGATORY NO. 25:

If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

RESPONSE:

See Response to No. 24.

INTERROGATORY NO. 26:

Referring to pages 52 and 53 of the Direct Testimony of Joseph Gillan, do you contend that a CLEC providing voice service to mass market customers with its own switch must serve a specific number of customers in order to be considered as a trigger candidate? If the answer to this Interrogatory is in the affirmative, state with specificity the number of customers that the CLEC must be serving and describe with particularity how this number was calculated.

RESPONSE:

No. The point in Mr. Gillan's testimony is that de minimus levels of competitive activity do not satisfy the TRO's trigger requirements, consistent with the FCC's analysis. While no specific value was established by the FCC, as explained in Mr. Gillan's testimony the FCC routinely and repeatedly rejected ILEC claims that levels of competitive activity far greater than that claimed by BellSouth (0.5% here demonstrated non-impairment).

Answer provided by Joseph Gillan.

INTERROGATORY NO. 27

Referring to page 56 of the Direct Testimony of Joseph Gillan, is Mr. Gillan's testimony that "[t]he incumbent's network would be disrupted by a shift of UNE-P lines to UNE-L" based on any empirical analysis, study, or evaluation? If the answer to this Interrogatory is in the

affirmative, describe with particularity that analysis, study, or evaluation.

RESPONSE:

No.

Answer provided by Joseph Gillan.

INTERROGATORY NO. 28:

Referring to page 63 of the Direct Testimony of Joseph Gillan, for those individual carriers that comprise CompSouth, identify each such carrier that has pursued “a UNE-P entry strategy” in South Carolina.

RESPONSE:

In addition to its general objections, CompSouth objects on the grounds that BellSouth is already in possession of the information necessary to answer this question.

INTERROGATORY NO. 29:

For those carriers identified in response to Interrogatory 28, state the total dollar amount of investment that each such carrier has made in South Carolina since January 1, 2000 in connection with its “UNE-P entry strategy.” In answering this Interrogatory, please:

- (a) provide a breakdown of the specific categories of investment (e.g., billing systems, offices, human capital, etc.) made by each such carrier in South Carolina for each year since January 1, 2000; and
- (b) state the total dollar amounts invested in those categories by each such carrier in Alabama for each year since January 1, 2000.

RESPONSE:

See Response to No. 28. Further, in addition to its general objections, CompSouth

objects on the grounds that it is a coalition formed for advocating regulatory policy and has no legal authority to compel its members to respond to indirect discovery of this kind from BellSouth or any other party, and BellSouth was within its rights to serve this Interrogatory individually on CompSouth members if it so chose.

REQUESTS FOR PRODUCTION OF DOCUMENTS

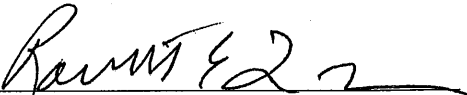
REQUEST NO. 1:

Produce all documents identified in response to BellSouth's First Requests for Admissions and First Set of Interrogatories.

RESPONSE:

No documents were identified.

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CERTIFICATE OF SERVICE

I, the undersigned employee of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for CompSouth, do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

Pleadings: **COMPSOUTH'S RESPONSES TO BELLSOUTH'S FIRST
REQUEST FOR ADMISSIONS; FIRST SET OF
INTERROGATORIES AND FIRST REQUESTS
FOR PRODUCTION OF DOCUMENTS
(Docket No. 2003-326-C)**

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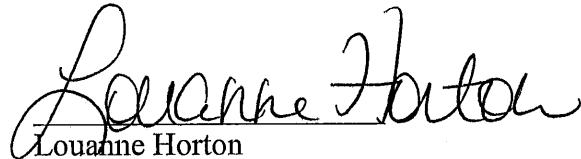
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